FACT SHEET

as required by LAC 33:IX.3111 for major LPDES facilities, for draft **Louisiana Pollutant Discharge Elimination System Permit No. LA0038822; AI 51970; PER20060001** to discharge to waters of the **State of Louisiana** as per LAC 33:IX.2311.

The **permitting authority** for the Louisiana Pollutant Discharge Elimination System (LPDES) is:

Louisiana Department of Environmental Quality
Office of Environmental Services
P. O. Box 4313
Baton Rouge, Louisiana 70821-4313

I. **THE APPLICANT IS:** City of Grambling
Grambling Regional Wastewater Treatment Plant
P.O. Box 108
Grambling, LA 71245

II. **PREPARED BY:** Rachel Owens

DATE PREPARED: June 17, 2008

III. **PERMIT ACTION:** reissue LPDES permit LA0038822, AI 51970; PER20060001

LPDES application received: June 21, 2006

EPA has retained enforcement authority.

Previous LPDES permit effective: January 1, 2002
Previous LPDES permit expired: December 31, 2006

IV. **FACILITY INFORMATION:**

A. The application is for the discharge of treated sanitary wastewater from a publicly owned treatment works serving the City of Grambling and Grambling State University.

B. The permit application does not indicate the receipt of industrial wastewater.

C. The facility is located on 7706 U.S. Highway 80 West in Grambling, Lincoln Parish.

D. The treatment facility consists of an activated sludge system using an oxidation ditch process with rotors for the aeration, and a final clarifier. Chlorine is the method of disinfection. Dechlorination is used to reduce the chlorine residual. The effluent then passes through a post aeration process prior to discharge.

E. Outfall 001

Discharge Location: Latitude 32° 30' 39" North
Longitude 92° 43' 9" West

Description: treated sanitary wastewater

Design Capacity: 1.5 MGD

Type of Flow Measurement which the facility is currently using:
Totalizing meter with Continuous Recorder

V. RECEIVING WATERS:

The discharge is into Redwine Creek, thence into the Dugdemona River, thence into Big Creek in segment 081401 of the Ouachita River Basin. This segment is not listed on the 303(d) list of impaired waterbodies.

The critical low flow (7Q10) of Redwine Creek is 0 cfs based on a report from Will Barlett, March 13, 2007. Since the 7Q10 is equal to zero, 0.1 will be used as the default 7Q10 value.

The hardness value is 28.25 mg\l and the fifteenth percentile value for TSS is 6.0 mg\l. This information was based on a report from Will Barlett, March 13, 2007.

The designated uses and degree of support for Segment 081401 of the Ouachita River Basin are as indicated in the table below[1/]:

Degree of Support of Each Use						
Primary Contact Recreation	Secondary Contact Recreation	Propagation of Fish & Wildlife	Outstanding Natural Resource Water	Drinking Water Supply	Shell fish Propagation	Agriculture
Full	Full	Full	N/A	N/A	N/A	N/A

[1/]The designated uses and degree of support for Segment 081401 of the Ouachita River Basin are as indicated in LAC 33:IX.1123.C.3, Table (3) and the 2006 Water Quality Management Plan, Water Quality Inventory Integrated Report, Appendix A, respectively.

VI. ENDANGERED SPECIES:

The receiving waterbody, Subsegment 081401 of the Ouachita River Basin, is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U. S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated October 27, 2007 from Boggs (FWS) to Brown (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. It was determined that the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat.

VII. HISTORIC SITES:

The discharge is from an existing facility location, which does not include an expansion beyond the existing perimeter. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the 'Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits' no consultation with the Louisiana State Historic Preservation Officer is required.

VIII. PUBLIC NOTICE:

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit modification and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

For additional information, contact:

Ms. Rachel Owens
Water Permits Division
Department of Environmental Quality
Office of Environmental Services
P. O. Box 4313
Baton Rouge, Louisiana 70821-4313

IX. PROPOSED PERMIT LIMITS:

Subsegment 081401, Dugdemona River from headwaters to Big Creek, is not listed on LDEQ's Final 2006 303(d) List as impaired, and to date no TMDL's have been established. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by any future TMDLs.

As per LAC 33:IX.2707.L.2.a.ii, availability of information which was not available at the time of previous permit issuance and will justify the application of less stringent effluent limitations in the proposed permit constitutes an exception to LAC 33:IX.2707.L.1, which states when a permit is renewed or reissued standards or conditions must be at least as stringent as the final limitations, standards, or conditions in the previous permit. In the previous permit, this treatment facility was required to meet effluent limitations for total zinc of 1.18 lbs/day monthly average and 2.80 lbs/day daily maximum. A water quality screen was performed using data from the application and from DMRs from January 2006 through December 2007. The screen did not indicate a need for a limitation for total zinc. Therefore, the limitation for total zinc has been removed from this permit. See Appendix B-1 for more information.

Interim Limits:

OUTFALL 001

In order to allow the permittee time to upgrade the facility to meet the newly imposed limitations for Total Copper based on the Water Quality Screen (See Appendix B-1), **the following interim effluent limitations shall become effective on the effective date of the permit, and expire three years from the effective date of the permit**

Effluent Characteristic	Monthly Avg. (lbs./day)	Monthly Avg.	Weekly Avg.	Basis
$CBOD_5$ May- October November- April	 125 250	 10 mg/l 20 mg/l	 15 mg/l 30 mg/l	Limits are set in accordance with the Wasteload Allocation for Redwine Creek near Grambling (WLA 88.05), September 30, 1988. Approved by EPA on January 24, 2000.

Effluent Characteristic	Monthly Avg. (lbs./day)	Monthly Avg.	Weekly Avg.	Basis
TSS May- October November- April	 188 250	 15 mg/l 20 mg/l	 23 mg/l 30 mg/l	Since there is no numeric water quality criterion for TSS, and in accordance with the current Water Quality Management Plan, the TSS effluent limitations shall be based on a case-by-case evaluation of the treatment technology being utilized at a facility. Therefore, a Technology Based Limit has been established through Best Professional Judgement for the type of treatment technology utilized at this facility.
Ammonia-Nitrogen May- October Novmber-April	 25 50	 2 mg/l 4 mg/l	 4 mg/l 8 mg/l	Limits are set in accordance with the Wasteload Allocation for Redwine Creek near Grambling (WLA 88.05), September 30, 1988. Approved by EPA on January 24, 2000. Winter Limits were based on national aquatic toxcitiy concerns.
Dissolved Oxygen**	---	5 mg/l	N/A	Limits are set in accordance with the Wasteload Allocation for Redwine Creek near Grambling (WLA 88.05), September 30, 1988. Approved by EPA on January 24, 2000.

Effluent Characteristic	Monthly Avg. (lbs./day)	Daily Maximum (lbs/day)	Basis
Total Copper	Report	Report	Water Quality Screen indicated a need for a WQBL. Therefore, for monitoring and data information gathering purposes, Report is proposed in the interim period. See Appendix B-1 for additional information.

Final Effluent Limits:

Final Effluent Limits shall become effective three years from the effective date of the permit and expire on the expiration date of the permit.

Effluent Characteristic	Monthly Avg. (lbs./day)	Monthly Avg.	Weekly Avg.	Basis
$CBOD_5$ May- October November- April	 125 250	 10 mg/l 20 mg/l	 15 mg/l 30 mg/l	Limits are set in accordance with the Wasteload Allocation for Redwine Creek near Grambling (WLA 88.05), September 30, 1988. Approved by EPA on January 24, 2000..
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Dissolved Oxygen**		5 mg/l	N/A	Limits are set in accordance with the Wasteload Allocation for Redwine Creek near Grambling (WLA 88.05), September 30, 1988. Approved by EPA on January 24, 2000.

Effluent Characteristic	Monthly Avg. (lbs./day)	Daily Maximum (lbs/day	Basis
Total Copper*	0.078	0.186	Water Quality Screen indicated a need for a WQBL. Therefore, for monitoring and data information gathering purposes, Report is proposed in the interim period. See Appendix B-1 for additional information.

**This Dissolved Oxygen limit is the lowest allowable average of daily discharges over a calendar month. When monitoring is conducted, the Dissolved Oxygen shall be analyzed immediately, as per 40 CFR 136.3.

*The above draft priority pollutant limits for total copper are based upon the evaluation of one effluent analysis. The permittee may conduct and submit the results of three (3) or more additional effluent analyses to either refute or substantiate the presence of the above toxic pollutant during the Draft Permit comment period. The additional analyses will be evaluated by this Office to determine if the pollutant is potentially in the effluent and if it potentially exceeds the State's water quality standards.

Other Effluent Limitations:

(Effective from the Effective Date of the Permit and Expires on the Expiration Date of the Permit)

1) Fecal Coliform

The discharge from this facility is into a water body which has a designated use of Primary Contact Recreation. According to LAC 33:IX.1113.C.5.b.i, the fecal coliform standards for this water body are 200/100 ml and 400/100 ml. Therefore, the limits of 200/100 ml (Monthly Average) and 400/100 ml (Weekly Average) are proposed as Fecal Coliform limits in the permit. These limits are being proposed through Best Professional Judgement in order to ensure that the water body standards are not exceeded, and due to the fact that existing facilities have demonstrated an ability to comply with these limitations using present available technology.

2) pH

According to LAC 33:IX.3705.A.1., POTW's must treat to at least secondary levels. Therefore, in accordance with LAC 33:IX.5905.C., the pH shall not be less than 6.0 standard units nor greater than 9.0 standard units at any time.

3) Solids and Foam

There shall be no discharge of floating solids or visible foam in other than trace amounts in accordance with LAC 33:IX.1113.B.7.

4) Total Residual Chlorine

If chlorination is used to achieve the limitations for Fecal Coliform Bacteria, the effluent shall contain NO MEASURBALE Total Residual Chlorine (TRC) after disinfection and prior to disposal. Given the current constraints pertaining to chlorine analytical methods, No MEASURABLE will be defined as less than 0.1 mg/l of chlorine. Limits set in accordance with

the Water Quality Screen (see Appendix B-1) and the previous LPDES permit.

5) Toxicity Characteristics

In accordance with EPA's Region 6 Post-Third Round Toxics Strategy, permits issued to treatment works treating domestic wastewater with a flow (design or expected) greater than or equal to 1 MGD shall require biomonitoring at some frequency for the life of the permit or where available data show reasonable potential to cause lethality, the permit shall require a whole effluent toxicity (WET) limit (*Permitting Guidance Document for Implementing Louisiana Surface Water Quality Standards*, September 27, 2001 VERSION 4).

Whole effluent biomonitoring is the most direct measure of potential toxicity which incorporates the effects of synergism of the effluent components and receiving stream water quality characteristics. Biomonitoring of the effluent is, therefore, required as a condition of this permit to assess potential toxicity. LAC 33:IX.1121.B.3. provides for the use of biomonitoring to monitor the effluent for protection of State waters. The biomonitoring procedures stipulated as a condition of this permit are as follows:

The permittee shall submit the results of any biomonitoring testings performed in accordance with the LPDES Permit No. LA0038822, **Biomonitoring Section** for the organisms indicated below.

TOXICITY TESTS	FREQUENCY
Chronic static renewal 7-day survival & reproduction test using Ceriodaphnia dubia (Method 1002.0)	1/quarter
Chronic static renewal 7-day survival & growth test using fathead minnow (Pimephales promelas) (Method 1000.0)	1/quarter

Dilution Series - The permit requires five (5) dilutions in addition to the control (0% effluent) to be used in the toxicity tests. These additional concentrations shall be 30%, 40%, 54%, 72%, and 96%. The low-flow effluent concentration (critical low-flow dilution) is defined as 96% effluent. The critical dilution is calculated in Appendix B-1 of this fact sheet. Results of all dilutions shall be documented in a full report according to the test method publication mentioned in the **Biomonitoring Section** under Whole Effluent Toxicity. This full report shall be submitted to the Office of Environmental Compliance as contained in the Reporting Paragraph located in the **Biomonitoring Section** of the permit.

The permit may be reopened to require effluent limits, additional testing, and/or other appropriate actions to address toxicity if biomonitoring data show actual or potential ambient toxicity to be the result of the permittee's discharge to the receiving stream or water body. Modification or revocation of the permit is subject to the provisions of LAC 33:IX.2383. Accelerated or intensified toxicity testing may be required in accordance with Section 308 of the Clean Water Act

X. PREVIOUS PERMITS:

LPDES Permit No. LA0038822: Issued: January 1, 2002
Expired: December 31, 2006

Effluent Characteristic	Discharge Limitations Monthly Avg.	Weekly Avg.	Monitoring Requirements Measurement Frequency	Sample Type
Flow	Report	Report	Continuous	Recorder
$CBOD_5$				
April- October	125 lbs/day/ 10 mg/l	15 mg/l	2/week	6 Hr. Comp
November- March	250 lbs/day/ 20 mg/l	30 mg/l	2/week	6 Hr. Comp
TSS				
April- October	188 lbs/day/ 15 mg/l	23 mg/l	2/week	6 Hr. Comp
November- March	250 lbs/day/ 20 mg/l	30 mg/l	2/week	6 Hr. Comp
TRC	<0.1 mg/l daliy max		2/week	Grab
Ammonia-Nitrogen				
April- October	25 lbs/day/ 2 mg/l	4 mg/l	2/week	6 Hr. Comp
November- March	50 lbs/day/ 4 mg/l	8 mg/l	2/week	6 Hr. Comp
Dissolved Oxygen	5 mg/l	---	2/week	Grab
Fecal Coliform				
Colonies per 100ml	200 400		2/week	Grab
	Monthly Avg.	Daily Max		
Total Zinc	1.18 lbs/day	2.8 lbs/day	1/quarter	24 Hr. Comp
Biomonitoring	Monthly Avg. Min.	7 day min.		
Pimephales promelas	Report	Report	1/quarter	24 Hr. Comp.
Ceriodaphnia dubia	Report	Report	1/quarter	24 Hr. Comp.

The permit contains biomonitoring.
The permit contains pollution prevention language.
The permit contains pretreatment language.

XI. ENFORCEMENT AND SURVEILLANCE ACTIONS:

A) Inspections

A review of the files indicates the following inspections were performed during the period beginning January 1, 2006 and ending December 31, 2007 for this facility.

Date: March 27, 2006

Inspector: Casey Head
Findings and/or Violations:

1. The permit required a limit for Zinc. The DMR's did not have this limit on it.
2. A DMR check for January 2006 revealed that the wrong limits were recorded on the DMR due to an error on the spreadsheet used for calculating loadings
3. The flow meter has not been calibrated since 7/29/2004. A flow meter check revealed a percent error of 18.
4. The 6 hour composite sample was not being flow proportioned.

Date: May 1, 2007
Inspector: Casey Head
Findings and/or Violations:

1. A flow meter check revealed a percent error of 40.
2. Facility has had sanitary sewer overflows and has not submitted non-compliance reports about the SSO
3. The permit requires a limit for Zinc and on 3rd quarter 2006 the DMR's did not have this limit on it. The DMRs said "report". Weekly Average for Fecal Coliform was not being done as a Geometric mean.
4. Sample date on lab report does not reflect the correct date the CBOD, TSS & NH3-N samples were not collected.
5. TSS mo. average & weekly average were exceeded for July & August 2006.
6. Biomonitoring for 2nd & 3rd quarter failed

B) Compliance and/or Administrative Orders

A review of the files indicates that there are no recent compliance orders administered against this facility.

C) DMR Review

A review of the discharge monitoring reports for the period beginning January 2006 through December 2007 has revealed the following violations:

Parameter	Outfall	Period of Excursion	Permit Limit	Reported Quantity
TSS (weekly average)	001	July 2006	23 mg/l	29.50 mg/l
TSS (weekly average)	001	August 2006	23 mg/l	29.50 mg/l
TSS (weekly average)	001	September 2007	23 mg/l	34.50 mg/l
Ammonia (weekly average)	001	November 2007	4 mg/l	4.15 mg/l

XII. ADDITIONAL INFORMATION:

In accordance with LAC 33:IX.2707.C, this permit may be modified, or alternatively, revoked and reissued, to comply with any applicable effluent standard or limitations issued or approved under sections 301(b)(2)(c) and (D), 304(b)(2), and 307(a)(2) of the Clean Water Act, if the effluent standard or limitations so issued or approved:

a) Contains different conditions or is otherwise more stringent than any effluent limitation in the permit; or

b) Controls any pollutant not limited in the permit; or

c) Requires reassessment due to change in 303(d) status of waterbody; or

d) Incorporates the results of any total maximum daily load allocation, which may be approved for the receiving water body.

LDEQ reserves the right to impose more stringent discharge limitations and/or additional restrictions in the future. Additional limitations and/or restrictions are based upon water quality studies and can indicate the need for advanced wastewater treatment. Water quality studies of similar dischargers and receiving water bodies have resulted in monthly average effluent limitations of 5mg/L $CBOD_5$ and 2

mg/L NH_3-N. Prior to upgrading or expanding this facility, the permittee should contact LDEQ to determine the status of the work being done to establish future effluent limitations and additional permit conditions.

Final effluent loadings (i.e. lbs/day) have been established based upon the permit limit concentrations and the design capacity of 1.5 MGD.

Effluent loadings are calculated using the following example:

CBOD: 8.34 lb/gal x 1.5 MGD x 10 mg/l = 125 lb/day

At present, the **Monitoring Requirements, Sample Types, and Frequency of Sampling** as shown in the permit are standard for facilities of flows between 1.0 and 5.0 MGD.

Effluent Characteristics	Monitoring Requirements	
	Measurement Frequency	Sample Type
Flow	Continuous	Recorder
$CBOD_5$	2/week	6 Hr. Composite
Total Suspended Solids	2/week	6 Hr. Composite
Ammonia-Nitrogen	2/week	6 Hr. Composite
Dissolved Oxygen	2/week	Grab
Fecal Coliform Bacteria	2/week	Grab
pH	2/week	Grab
Copper	1/quarter	24-hr. Composite
Biomonitoring		
Ceriodaphnia dubia (Method 1002.0)	1/quarter	24 Hr. Composite
Pimephales promelas (Method 1000.0)	1/quarter	24 Hr. Composite

Compliance Schedule

In order to allow the permittee time to upgrade the facility to meet limitations imposed by water quality based limits, **INTERIM LIMITS** are proposed for this facility.

The permittee shall achieve compliance with the FINAL EFFLUENT LIMITATIONS and MONITORING REQUIREMENTS as specified in accordance with the following schedule:

ACTIVITY	DATE
Achieve Interim Effluent Limitations and Monitoring Requirements	On the effective date of the permit
Achieve Final Effluent Limitations and Monitoring Requirements	Three years from the effective date of the permit

The above listed activities must be achieved on or before the deadline date. Additionally, the permittee shall submit a progress report outlining the status of all facility improvements on a yearly basis until compliance is achieved.

Within 14 days of completion of the new facility or facility upgrade and/or expansion, the Permittee shall notify the Department of Environmental Quality-Office of Environmental Services in writing that construction has been completed.

The Permittee shall achieve sustained compliance with Final Effluent Limitations.

Where the percent project completion reported is less than would be required to assure completion of necessary upgrades by the required date, the report of progress shall also include an explanation for this delay and proposed remedial actions.

No later than 14 days following a date for a specific action (as opposed to a report of progress), the permittee shall submit a written notice of compliance or noncompliance.

Pretreatment Requirements

Due to the absence of pretreatment categorical standards for the indirect discharges, it is recommended that LDEQ Option 1 Pretreatment Language be included in LPDES Permit LA0038822.

This language is established for municipalities that do not have either an approved or required Pretreatment program. This recommendation is in accordance with 40 CFR Part 403 regulations, the General Pretreatment Regulations for Existing and New Sources of Pollution contained in LAC Title 33, Part IX, Chapter 61 and the Best Professional Judgement (BPJ) of the reviewer.

Pollution Prevention Requirements

The permittee shall institute or continue programs directed towards pollution prevention. The permittee shall institute or continue programs to improve the operating efficiency and extend the useful life of the facility. The permittee will complete an annual Environmental Audit Report **each year** for the life of this permit according to the schedule below. The permittee will accomplish this requirement by completing an Environmental Audit Form which has been attached to the permit. All other requirements of the Municipal Wastewater Pollution Prevention Program are contained in Part II of the permit.

The audit evaluation period is as follows:

Audit Period Begins	Audit Period Ends	Audit Report Completion Date
Effective Date of Permit	12 Months from Audit Period Beginning Date	3 Months from Audit Period Ending Date

Stormwater Discharges

Because the design flow of the facility is equal to or greater than 1.0 MGD and in accordance with LAC 33:IX.2511.B.14.i, the facility may contain storm water discharges associated with industrial activity. Therefore, in accordance with LAC 33:IX.2511.A.1.b, specific requirements addressing stormwater discharges will be included in the discharge permit.

XIII. TENTATIVE DETERMINATION:

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to reissue a permit for the discharge described in this Fact Sheet.

XIV. REFERENCES:

Louisiana Water Quality Management Plan / Continuing Planning Process, Vol. 8, "Wasteload Allocations / Total Maximum Daily Loads and Effluent Limitations Policy," Louisiana Department of Environmental Quality, 2005.

Louisiana Water Quality Management Plan / Continuing Planning Process, Vol. 5, "Water Quality

Inventory Section 305(b) Report," Louisiana Department of Environmental Quality, 1998.

Louisiana Administrative Code, Title 33 - Environmental Quality, Part IX - Water Quality Regulations, Chapter 11 - "Louisiana Surface Water Quality Standards," Louisiana Department of Environmental Quality, 2004.

Louisiana Administrative Code, Title 33 - Environmental Quality, Part IX - Water Quality Regulations, Subpart 2 - "The LPDES Program," Louisiana Department of Environmental Quality, 2004.

Low-Flow Characteristics of Louisiana Streams, Water Resources Technical Report No. 22, United States Department of the Interior, Geological Survey, 1980.

Index to Surface Water Data in Louisiana, Water Resources Basic Records Report No. 17, United States Department of the Interior, Geological Survey, 1989.

LPDES Permit Application to Discharge Wastewater, American Water & Wastewater Management, LLC, Grambling Regional Wastewater Treatment Plant, June 21, 2006.